

**REMARKS**

Claims 1-22 are pending in the Application.

Claims 1-22 stand rejected.

Claims 33 and 34 are new. No new matter has been added. Support for these amendments can be found, at least, within paragraphs [0022] and [0023] of the specification.

Claims 1, 2, 5, 12, and 13 have been amended. No new matter has been added. Support for the amendments to can be found, at least, within paragraphs [0022] and [0023] of the specification.

*Double Patenting*

Claims 1-22 are provisionally rejected under the judicially created doctrine of obviousness-type double patenting as purportedly being unpatentable over claims 1-24 of U.S. Patent Application No. 10/696,156. Since this is a provisional rejection, Applicants respectfully request that this rejection be held in abeyance until allowable subject matter is indicated in this or the copending application.

*Rejection of Claims under 35 U.S.C. § 101*

Claims 1-11 are rejected under 35 U.S.C. 101 because the claims are purportedly not tied to a particular machine. Independent claim 1 has been amended to tie the synchronization steps with an integration server. Applicants respectfully submit that this objection is overcome thereby.

*Rejection of Claims under 35 U.S.C. §103*

Claims 1-22 stand rejected under 35 U.S.C. § 103(a) as purportedly being unpatentable over U.S. Patent No. 5,708,828 (“Coleman”) in view of U.S. Patent Publication No. 2002/0178077 (“Katz”). Applicants respectfully traverse this rejection.

Applicants respectfully submit that neither Coleman nor Katz, alone or in any combination, teach or suggest, at the very least, that in the course of synchronizing

inventory balance information between a source and target system, information in an intermediate format includes a calculation of the inventory balance difference between a source inventory balance and a target inventory balance. This newly added limitation is in claim 1, and a similar limitation is in claim 12.

Coleman is cited as purportedly teaching the previously and currently claimed limitations covering “synchronizing”, “extracting”, and “converting.” *See* Office Action, p. 6. Notwithstanding other deficiencies of the Office Action’s position, Applicants respectfully submit that Coleman fails to teach or in any way suggest the teachings of features in any way comparable to the newly recited limitations, as well as the existing limitations. Particularly, as conceded by the Office Action, Coleman fails to disclose inventory balance information. *See* Office Action, p. 7. Without considering inventory balance information, it would not be possible for Coleman to consider calculating an inventory balance difference between a source inventory balance and a target inventory balance. Even if the concept of inventory balance information could be successfully introduced to Coleman somehow, there would be no basis for expecting such a combination to produce anything like the claimed calculation in the course of synchronizing a source and target system. In other words, an ordinary artisan could not be expected to use the mere idea of inventory balance information to arrive at the claimed calculation of the inventory balance difference between a source and target system as the engine for synchronizing the source and target systems.

Further, while Katz is cited as purportedly teaching inventory balance information, Katz is silent on synchronizing a source and target system, and further, doing so by calculating an inventory balance difference between a source inventory balance and a target inventory balance. The Office Action cites three sections of Katz; however, these do not apply to the “calculating” limitation. The first citation to Katz describes Katz’s system being updated with a variety of data. *See* Katz ¶ [0039]. This purported updating in Katz only discusses updating in general terms, there is no mention of any specific method by which the updating is accomplished, much less “calculating” as claimed. The second citation to Katz merely presents characteristics of the internal data. *See* Katz ¶ [0042]. Katz’s internal data provides no teaching or suggestion as to any method for synchronizing inventory balance information, much less by calculating an

inventory balance difference, as claimed. The third citation to Katz describes batch updates and real-time updates of external data. *See Katz ¶ [0220].* As with the initial reference to Katz’s “updating”, the mere mention of updating data, even if such a parallel were accurate (which Applicants maintain is not the case), cannot be successfully characterized as teaching or suggesting the claimed “calculating” limitation.

Katz’s lack of teaching is due in part to Katz’s failure to consider synchronizing information in any way that is comparable to the claimed synchronization. Katz presents a monolithic Value Chain Intelligence (VCI) system for managing enterprise data. *See Katz Abstract.* Katz manages this enterprise data by bringing in external data from multiple sources and making use of the imported information. *See Katz ¶¶ [0011]-[0020].* Given this one-directional flow of information in Katz, from an external source to the VCI system, it would not be possible to accomplish the claimed synchronization, which includes as a synchronization step the calculation of the inventory balance difference between a source and target’s inventory balances. Katz is simply silent on any type of calculation that uses data from two different systems. Katz much less uses anything like the claimed calculation in the course of synchronizing two different systems.

Further, amended claims 2 and 13 provide additional distinguishing features of the “calculating” limitation of claims 1 and 12. The “calculating” step of claims 1 and 12 recites that the calculation finds the difference between a source inventory balance and a target inventory balance. Claims 2 and 13 recite that for the integration server to perform this calculation, a request to the target system is made for existing target inventory balance information. No such request to a target system is remotely suggested in either Coleman or Katz. This lack of teaching in Coleman and Katz stems from the fact that neither reference performs a calculation of the difference in inventory balances of a source and target system in the first place.

It further follows that neither Coleman nor Katz teach the elements of new claims 33 and 34, which further recite the steps carried out in performing the claimed “calculating.” Particularly, claim 33 recites that the integration receives the existing target inventory information in the target format, which naturally follows from the fact that this information comes from the target system. Next, claim 34 recites that the

integration server then converts the existing target inventory balance information into the intermediate format. At this point, the integration server has the source inventory balance information and the existing target inventory balance information in the intermediate format. Now, with all inventory balance information in the intermediate format, the integration server can perform the calculation on inventory balance information that is in the same format. Given that neither Coleman nor Katz contemplates the claimed “calculating” limitation, it follows that neither contemplate the claimed steps by which this calculation is performed.

Applicants further submit that the claimed “calculating” limitation cannot be expected from any combination of Coleman and Katz because neither reference considers the advantages that are possible with the claimed method of synchronizing multiple inventory management systems. For example, because the inventory balance information in the target system is not simply being overwritten, it is possible for the integration server to detect inventory balance adjustments/differences that may require additional attention. Thus, if the inventory balance difference is very large, the integration server may alert a company agent to investigate whether or not the target system can handle the adjustment. Also, because the target inventory management system is being updated with a calculated difference, it is possible for the integration server to calculate the difference between multiple source systems and integrate the information from the multiple sources at the integration server in one single update to the target inventory management system. This integration of multiple sources would introduce another level of efficiency possible with the claimed synchronization method.

For at least these reasons, Applicants submit that neither Coleman nor Katz, alone or in combination, provide disclosure of all the limitations of independent claims 1 and 12, and all claims depending therefrom, and that these claims are in condition for allowance. Applicants therefore respectfully request the Examiner’s reconsideration and withdrawal of the rejections to these claims.

PATENT

CONCLUSION

In view of the amendments and remarks set forth herein, this Application is believed to be in condition for allowance and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is invited to telephone the undersigned.

If any extensions of time under 37 C.F.R. § 1.136(a) are required in order for this submission to be considered timely, Applicants hereby petition for such extensions. Applicants also hereby authorize that any fees due for such extensions or any other fee associated with this submission, as specified in 37 C.F.R. § 1.16 or § 1.17, be charged to deposit account 502306.

Respectfully submitted,

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